

1 NANCY E. PRITIKIN, Bar No. 102392
2 RONALD D. ARENA, Bar No. 218421
3 LITTLER MENDELSON
4 A Professional Corporation
5 650 California Street, 20th Floor
6 San Francisco, CA 94108.2693
7 Telephone: 415.433.1940

8 Attorneys for Defendant
9 RIGHT MANAGEMENT CONSULTANTS, INC.

10 CHARLES M. LOUDERBACK, Bar No. 88788
11 JANINE R. HUDSON, Bar No. 206671
12 THE LOUDERBACK LAW FIRM
13 One Embarcadero Center, Suite 2300
14 San Francisco, CA 94111
15 Telephone: 415.398.7860

16 Attorneys for Plaintiff
17 MARY JEAN HONG

18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA
20 SAN FRANCISCO DIVISION

21 MARY JEAN HONG,

22 Plaintiff,

23 v.

24 RIGHT MANAGEMENT
25 CONSULTANTS, INC., DOES 1 through
26 100, inclusive,

27 Defendants.

Case No. C04 4011 PJH (EDL)

DISCOVERY MATTER

**STIPULATION AND ~~[PROPOSED]~~
ORDER EXTENDING EXPERT
DISCOVERY CUTOFF DATE TO
ACCOMMODATE DEPOSITIONS OF
RHOMA YOUNG AND JERALD
UDINSKY**

1 **WHEREAS** the expert discovery cutoff date in this case is February 22, 2006;

2 **WHEREAS** one of plaintiff's retained expert witnesses, Ms. Rhoma Young, must
3 undergo abdominal surgery on February 15, 2006, and is unavailable to sit for deposition before
4 February 15, 2006, due to other obligations and in order for her to complete preparations for her
5 surgery;

6 **WHEREAS** Ms. Young will require a reasonable period of convalescence following
7 the surgery in order to become physically able to sit for the deposition, and believes she will be
8 physically able to sit for deposition by March 8, 2006;

9 **WHEREAS** due to other prior commitments, one of defendant's retained experts, Dr.
10 Jerald Udinsky, Ph.D., is unavailable to sit for deposition during reasonable business hours at any
11 point before March 2006, but can be available to sit for deposition on March 6, 2006; and

12 **WHEREAS** the parties agree that, under these circumstances, good cause exists to
13 grant a short extension of the February 22, 2006 expert discovery cutoff date to allow for these
14 particular depositions to go forward on the dates proposed above;

15 **IT IS HEREBY STIPULATED AND AGREED** by and between the Parties hereto
16 through their undersigned counsel, that the deposition of Ms. Rhoma Young shall take place on
17 March 8, 2006 and the deposition of Dr. Jerald Udinsky shall take place on March 6, 2006.

18 **IT IS SO STIPULATED.**

19
20 DATED: February 10, 2006

By: _____/s/
PAUL D. HERBERT
THE LOUDERBACK LAW FIRM
Attorneys for Plaintiff
MARY JEAN HONG

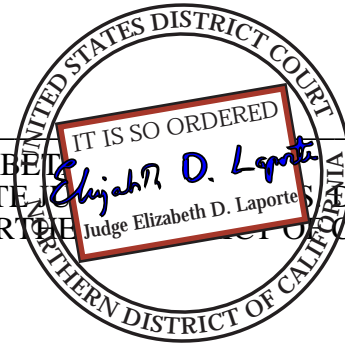
21
22
23
24 DATED: February 10, 2006

By: _____/s/
RONALD D. ARENA
LITTLER MENDELSON, P.C.
A Professional Corporation
Attorneys for Defendant
RIGHT MANAGEMENT
CONSULTANTS, INC.

SO ORDERED.

DATED: February 14, 2006

HON. ELIZABETH D. LAPORTE
MAGISTRATE JUDGE
COURT, NORTHERN DISTRICT OF CALIFORNIA



Firmwide:80816266.1 027746.1002